

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

VALUTA CORPORATION, INC., and
PAYAN’S FUEL CENTER, INC.,

Plaintiffs,

v.

FINANCIAL CRIMES ENFORCEMENT
NETWORK, *et al.*,

Defendants.

Civil Case No. 3:25-cv-00191-LS

**DECLARATION OF ANDRES PAYAN, JR.
IN SUPPORT OF PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION**

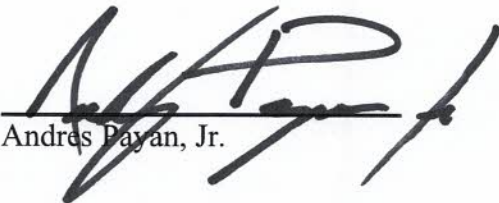
I, Andres Payan, Jr., being of competent mind, declare as follows:

1. I am a United States citizen and a resident of El Paso. I am 42 years old.
2. I am the manager of Payan’s Fuel Center, Inc., a Texas corporation. I have authority to speak for Payan’s.
3. Payan’s is a Money Services Business (MSB) that is one of the Plaintiffs in this case.
4. I believe that there are MSBs in the targeted zip codes that are not listed by FinCEN. For instance, there is a grocery store in a targeted zip codes that did money transfers until recently, but FinCEN does not list it in the targeted zip codes.
5. I think the GTO is invalid for all the MSBs. Payan’s and the other affected MSBs have the same interest in getting rid of it. I don’t want a different rule for just Payan’s. I wouldn’t want to settle the case to gain a benefit for just us.
6. On June 30, 2025, I spoke with one of Plaintiffs’ lawyers, Andrew Ward. We

discussed what a class action is and the advantages and disadvantages of proceeding in one.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 1st day of July, 2025.



Andres Payan, Jr.